

EXHIBIT B

From: Jerrold Bregman <jbregman@bg.law>
Sent: Thursday, September 24, 2020 3:30 PM
To: Kevin Coleman
Subject: RE: Proof of Claim 18-12456-gs

Thanks Kevin. We are talking with Jeff tomorrow am about other matters and will try to get a response then. Will keep you posted. - Jerry

BRUTZKUS GUBNER YOUR COUNSEL MATTERS™

Woodland Hills, CA
21650 Oxnard St., Suite 500
Woodland Hills, CA 91367-4911
(818) 827-9000 Main
(818) 827-9090 Fax

Denver, Colorado
5445 DTC Parkway, Suite 800
Greenwood Village, CO 80111
(818) 827-9000 Main
(818) 827-9045 Fax

www.bg.law

Jerrold Bregman
Of Counsel
(303) 835-1291 Direct
(818) 827-9101 Direct
(646) 251-9699 Cell
jbregman@bg.law
 Jerrold Bregman
Licensed in California,
Colorado and New York

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From: Kevin Coleman [mailto:kcoleman@nutihart.com]
Sent: Thursday, September 24, 2020 3:18 PM
To: Jerrold Bregman <jbregman@bg.law>
Subject: FW: Proof of Claim 18-12456-gs

CAUTION: This email originated from an external source.

Hi Jerry,

Thank you for filing the proofs of claim. Before I take any substantive action with respect to them, I want to ask if your client will agree not to assert and/or waive any conflict of interest associated with objecting to the claims.

As you know, there is authority holding that counsel to a trustee represents the estate. To the extent that applies, I do not want to have a side-show over whether any actions taken with respect to objecting to the claims constitutes a breach of duty owed to a former client (specifically, breach of the duty of loyalty or use of confidential information obtained in a prior representation). If an objection is sustained, that obviously will impact the assets in the Desert Land estate. I do think the claims are baseless, and if your client grants the waiver I will be preparing an objection.

Can you please let me know if Jeff is prepared to waive this arguable conflict? If so, I will prepare a short stipulation and order for submission to the court. If not, we will arrange for counsel for the Gonzales Trust or special counsel to handle the objection. Either way, please let me know as soon as possible what decision he makes.

Best regards,

--Kevin

From: USBC_NEVADA@nvb.uscourts.gov [mailto:USBC_NEVADA@nvb.uscourts.gov]

Sent: Wednesday, September 23, 2020 4:03 PM

To: Courtmail@nvb.uscourts.gov

Subject: Proof of Claim 18-12456-gs

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U.S. Bankruptcy Court

District of Nevada

Notice of Electronic Claims Filing

The following transaction was received from GUBNER, STEVEN on 9/23/2020 at 4:02 PM PDT

Case Name: DESERT OASIS APARTMENTS, LLC

Case Number: [18-12456-gs](#)

Desert Land, LLC

c/o Jeffrey I. Golden, Trustee
650 Town Center Dr., Suite 600
Costa Mesa, CA 92626

Claim Number: [3](#) [Claims Register](#)

Amount Claimed: \$78,000,000.00

Amount Secured:

Amount Priority:

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:9-23-20 Apartments Claim v2.pdf

Electronic document Stamp:

[STAMP bkecfStamp_ID=989277954 [Date=9/23/2020] [FileNumber=33243432-0
] [c5321da9a6b2bf70ec52627cbf3c8d2bdc6c3e50dafa2f92aa3b8d50de31eb4e316
3cdd570c9b6154d8f309baeb2bfacdee9363ccd1d76c5cf4d0d2decc5189e]]

18-12456-gs Notice will be electronically mailed to:

ANTHONY W. AUSTIN on behalf of Creditor THE NORTHERN TRUST COMPANY
aaustin@fclaw.com, gkbacon@fclaw.com

DAWN M. CICA on behalf of Defendant DAVID GAFFIN

dcica@carlyoncica.com,
nrodriguez@carlyoncica.com; crobertson@carlyoncica.com; dmcica@gmail.com; dcica@carlyoncica.com; tosteen@carlyoncica.com; 3342887420@filings.docketbird.com

DAWN M. CICA on behalf of Defendant HOWARD BULLOCH

dcica@carlyoncica.com,
nrodriguez@carlyoncica.com; crobertson@carlyoncica.com; dmcica@gmail.com; dcica@carlyoncica.com; tosteen@carlyoncica.com; 3342887420@filings.docketbird.com

DAWN M. CICA on behalf of Interested Party DAVID GAFFIN

dcica@carlyoncica.com,
nrodriguez@carlyoncica.com; crobertson@carlyoncica.com; dmcica@gmail.com; dcica@carlyoncica.com; tosteen@carlyoncica.com; 3342887420@filings.docketbird.com

DAWN M. CICA on behalf of Interested Party HOWARD BULLOCH

dcica@carlyoncica.com,
nrodriguez@carlyoncica.com; crobertson@carlyoncica.com; dmcica@gmail.com; dcica@carlyoncica.com; tosteen@carlyoncica.com; 3342887420@filings.docketbird.com

KEVIN W COLEMAN on behalf of Plaintiff KAVITA GUPTA

kcoleman@nutihart.com, nwhite@nutihart.com

KEVIN W COLEMAN on behalf of Trustee KAVITA GUPTA

kcoleman@nutihart.com, nwhite@nutihart.com

JAMIE P. DREHER on behalf of Petitioning Creditor BRADLEY J. BUSBIN, AS TRUSTEE OF THE GONZALES CHARITABLE REMAINDER UNITRUST ONE

jdreher@downeybrand.com, mfrazier@downeybrand.com

KIMBERLY S. FINEMAN on behalf of Trustee KAVITA GUPTA

kfineman@nutihart.com

EDMUND GEE on behalf of U.S. Trustee U.S. TRUSTEE - LV - 11, 11
edmund.gee@usdoj.gov

TALITHA B. GRAY KOZLOWSKI on behalf of Plaintiff KAVITA GUPTA
tgray@gtg.legal, bknotices@gtg.legal

TALITHA B. GRAY KOZLOWSKI on behalf of Trustee KAVITA GUPTA
tgray@gtg.legal, bknotices@gtg.legal

JUSTIN J. HENDERSON on behalf of Creditor JUNIPER LOAN SERVICING CORPORATION

jhenderson@lrrc.com, cscruggs@lrrc.com, justin-henderson-8499@ecf.pacerpro.com

TRACY M. O'STEEN on behalf of Defendant 10181 PARK RUN LLC

tosteen@carlyoncica.com,
crobertson@carlyoncica.com; nrodriguez@carlyoncica.com; ccarlyon@carlyoncica.com

TRACY M. O'STEEN on behalf of Defendant COMPASS INVESTMENTS LLC

tosteen@carlyoncica.com,
crobertson@carlyoncica.com; nrodriguez@carlyoncica.com; ccarlyon@carlyoncica.com

TRACY M. O'STEEN on behalf of Defendant THE RANCH LLC

tosteen@carlyoncica.com,
crobertson@carlyoncica.com; nrodriguez@carlyoncica.com; ccarlyon@carlyoncica.com

TRACY M. O'STEEN on behalf of Defendant DAVID GAFFIN

tosteen@carlyoncica.com,
crobertson@carlyoncica.com; nrodriguez@carlyoncica.com; ccarlyon@carlyoncica.com

TRACY M. O'STEEN on behalf of Defendant HOWARD BULLOCH

tosteen@carlyoncica.com,
crobertson@carlyoncica.com; nrodriguez@carlyoncica.com; ccarlyon@carlyoncica.com

TRACY M. O'STEEN on behalf of Interested Party CITATION FINANCIAL, LLC,

tosteen@carlyoncica.com,
crobertson@carlyoncica.com; nrodriguez@carlyoncica.com; ccarlyon@carlyoncica.com

TRACY M. O'STEEN on behalf of Interested Party COMPASS INVESTMENTS HOLDINGS, LLC

tosteen@carlyoncica.com,
crobertson@carlyoncica.com; nrodriguez@carlyoncica.com; ccarlyon@carlyoncica.com

TRACY M. O'STEEN on behalf of Interested Party DESERT LAND LOAN ACQUISITION, LLC

tosteen@carlyoncica.com,
crobertson@carlyoncica.com; nrodriguez@carlyoncica.com; ccarlyon@carlyoncica.com

TRACY M. O'STEEN on behalf of Interested Party DAVID GAFFIN
tosteen@carlyoncica.com,
crobertson@carlyoncica.com;nrodriguez@carlyoncica.com;ccarlyon@carlyoncica.com

TRACY M. O'STEEN on behalf of Interested Party HOWARD BULLOCH
tosteen@carlyoncica.com,
crobertson@carlyoncica.com;nrodriguez@carlyoncica.com;ccarlyon@carlyoncica.com

ERIC R OLSEN on behalf of Interested Party WASH MULTIFAMILY LAUNDRY SYSTEMS,
LLC
eolsen@gtg.legal

LENARD E. SCHWARTZER on behalf of Debtor DESERT OASIS APARTMENTS, LLC
bkfilings@s-mlaw.com

U.S. TRUSTEE - LV - 11, 11
USTPRegion17.lv.ecf@usdoj.gov

MARK M. WEISENMILLER on behalf of Interested Party WASH MULTIFAMILY
LAUNDRY SYSTEMS, LLC
mweisenmiller@gtg.legal, bknotices@gtg.legal

MARK WRAY on behalf of Petitioning Creditor BRADLEY J. BUSBIN, AS TRUSTEE OF
THE GONZALES CHARITABLE REMAINDER UNITRUST ONE
mwray@markwraylaw.com, tmoore@markwraylaw.com

18-12456-gs Notice will not be electronically mailed to:

KEVIN W. COLEMAN on behalf of Plaintiff KAVITA GUPTA
NUTI HART LLP
411 30TH STREET, STE. 408
OAKLAND, CA 94609

KAVITA GUPTA
1300 BRISTOL ST NO, STE 100
NEWPORT BEACH, CA 92660

ROBERT E LEVINE
3813 SUNSET LANE
OXNARD, CA 93035

TAMARA M LEVINE
3813 SUNSET LANE
OXNARD, CA 93035

CATHY L. REECE on behalf of Creditor THE NORTHERN TRUST COMPANY
2394 EAST CAMELBACK RD STE 600
PHOENIX, AZ 85016